

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO, WESTERN DIVISION**

Ryan Welling,)	Case No:
)	
Plaintiff,)	
)	Judge:
v.)	
)	Magistrate Judge:
Palwinder Singh Randhawa, et al.)	
)	
Defendants.)	

NOTICE OF REMOVAL

Now come Defendants, Honeybee Transportation, Inc. and Palwinder Randhawa, by and through counsel, Reminger Co., L.P.A., and hereby file their Notice of Removal pursuant to 28 U.S.C. § 1441 with the United States District Court for the Northern District of Ohio, Western Division. In support of removal, Defendants state as follows:

1. This case was commenced and is now pending in the Common Pleas Court of Allen County, Ohio, styled *Ryan Welling v. Palwinder Singh Randhawa, et al.*, Case No. CV2021 0273. A true and accurate copy of the docket in the Allen County Action is attached hereto as Exhibit “A.”
2. Plaintiff commenced this action by filing a complaint in the Allen County Court of Common Pleas on September 7, 2021. A true and accurate copy of the complaint is attached hereto as Exhibit “B.”
3. Defendant Randhawa was served with a copy of the Complaint on October 1, 2021 by USPS in Canada.
4. Defendant Honeybee was served with a copy of the Complaint on October 19, 2021 by USPS in Canada.

5. At the time Plaintiff filed his Complaint, he was a citizen of the state of Ohio, residing in Millbury, Ohio. See Plaintiff's Complaint.

6. Defendants are not a citizen of the state of Ohio. More specifically, Defendant Honeybee is foreign a corporation organized and existing under the laws of Canada with is principal place of business in Windsor, Ontario, Canada. Defendant Randhawa is a resident of Calgary, Alberta, Canada.

7. Thus, this controversy is wholly between citizens of different states.


8. The United States District Court, pursuant to the provisions of 28 U.S.C. § 1332, has jurisdiction over this action because there is complete diversity, and, upon information and belief, the matter in controversy exceeds the sum of \$75,000 exclusive of interest and cost.

9. This notice is filed pursuant to 28 U.S.C. § 1441 within the time limits prescribed by 28 U.S.C. § 1446(b).

10. Defendants will give written notice of the filing of this notice to the Allen County Court of Common Pleas as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendants provide notice that this action is removed to the United States District Court for the Northern District of Ohio, Western Division, pursuant to 28 U.S.C. § 1441 and 1446, and that the Common Pleas Court of Allen County shall proceed no further unless this case is remanded.

Respectfully submitted,



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Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon the following parties via e-mail this 1st day of November, 2021:

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